

FILED
DISTRICT COURT OF GUAM

AUG 28 2007 

JEANNE G. QUINATA
Clerk of Court

1 ANNA Y. PARK, Regional Attorney
2 DEREK LI, Supervisory Trial Attorney
3 GREGORY McCLINTON, Senior Trial Attorney
U.S. EQUAL EMPLOYMENT
OPPORTUNITY COMMISSION
255 East Temple Street, Fourth Floor
4 Los Angeles, CA 90012
Telephone: (213) 894-1068
5 Facsimile: (213) 894-1301
E-Mail: lado.legal@eeoc.gov

7 ANGELA D. MORRISON, Trial Attorney
333 S. Las Vegas Blvd., Suite 8112
8 Las Vegas, NV 89101
Telephone: (702) 894-5072
9 Facsimile: (702) 894-5094
E-mail: angela.morrison@eeoc.gov

10 Attorneys for Plaintiff
11 U.S. EQUAL EMPLOYMENT
OPPORTUNITY COMMISSION

12 LEONARDO M. RAPADAS
13 United States Attorney
14 MIKEL W. SCHWAB
Assistant U.S. Attorney
Sirena Plaza, Suite 500
15 108 Hernan Cortez Ave.
Hagåtña, Guam 96910
16 Telephone: (671) 472-7332
Facsimile: (671) 472-7334

17 Attorneys for United States of America

19 **UNITED STATES DISTRICT COURT**

20 **TERRITORY OF GUAM**

21 U.S. EQUAL EMPLOYMENT) CIVIL CASE NO. 06-00028
22 OPPORTUNITY COMMISSION,)
Plaintiff,)
vs.)
25 LEO PALACE RESORT,)
Defendant.)
28 _____)

23) **NOTICE OF LODGING OF**
24) **ORIGINAL SIGNATURE**

ORIGINAL

1 COMES NOW the United States and lodges with the Court, the original signature, of the
2 government's Declaration of Angela Morrison in Support of Plaintiff EEOC's Opposition to
3 Defendant's Alternative {Motion} to Dismiss Emotional Distress Claims; Motion to Extend
4 Discovery Completion Deadline; and Motion for Independent medical Examination in the above-
5 captioned matter, a facsimile copy of which was previously filed on August 14, 2007.
6

7 Respectfully submitted this 28th day of August, 2007.
8
9

10 LEONARDO M. RAPADAS
11 United States Attorney
12 Districts of Guam and NMI
13

By:

14 MIKEL W. SCHWAB
Assistant U.S. Attorney

15
16
17
18
19
20
21
22
23
24
25
26
27
28

1 Anna Y. Park, Regional Attorney
2 Derek Li, Supervisory Trial Attorney
3 Gregory McClinton Senior Trial Attorney
4 Angela D. Morrison, Trial Attorney
5 U.S. EQUAL EMPLOYMENT
6 OPPORTUNITY COMMISSION
7 255 East Temple Street, Fourth Floor
8 Los Angeles, CA 90012
9 Telephone: (213) 894-1068
10 Facsimile: (213) 894-1301
11 E-Mail: lado.legal@eeoc.gov

12 333 S. Las Vegas Blvd., Suite 8112
13 Las Vegas, NV 89101
14 Telephone: (702)894-5072
15 Facsimile: (702)894-5094
16 E-mail: angela.morrison@eeoc.gov

17 Attorneys for Plaintiff
18 U.S. EQUAL EMPLOYMENT
19 OPPORTUNITY COMMISSION

20 **UNITED STATES DISTRICT COURT**

21 **DISTRICT OF GUAM**

22 U.S. EQUAL EMPLOYMENT
23 OPPORTUNITY COMMISSION,

24 } Case No.: 2:06-CV-00028

25 Plaintiff,

26 v.
27 LEO PALACE RESORT,
28 Defendant.

29 } DECLARATION OF ANGELA
30 } MORRISON IN SUPPORT OF
31 } PLAINTIFF EEOC'S OPPOSITION
32 } TO DEFENDANT'S ALTERNATIVE
33 } [MOTION] TO DISMISS
34 } EMOTIONAL DISTRESS CLAIMS;
35 } MOTION TO EXTEND DISCOVERY
36 } COMPLETION DEADLINE; AND
37 } MOTION FOR INDEPENDENT
38 } MEDICAL EXAMINATION

39 JENNIFER HOLBROOK; VIVIENE
40 VILLANUEVA; and ROSEMARIE
41 TAIMANGLO,

42 Plaintiff-Intervenors,

43 v.

44 MDI GUAM CORPORATION d/b/a LEO
45 PALACE RESORT MANENGGON
46 HILLS and DOES 1 through 10,

47 Defendants.

1 I, Angela D. Morrison, declare and state:

2 1. I am a Trial Attorney employed at the Las Vegas Local Office, Los Angeles
3 District Office of the United States Equal Employment Opportunity Commission. I have
4 personal knowledge of the facts stated herein, and if called as a witness to testify as to the
5 matters stated herein, I could and would competently do so.

6 2. Attached hereto as Exhibit 1 is a true and correct copy of Plaintiff EEOC's
7 Response to Defendant Leo Palace Resort's First Request for Production of Documents
8 to Plaintiff and of Plaintiff-Intervenors' Responses to Defendant's First Request for
9 Production of Documents.

10 3. Counsel for Defendant took the depositions of Jennifer Holbrook on March 17,
11 2007, Viviene Villanueva on March 21, 2007, and Rosemarie Taimanglo on March 22,
12 2007; which depositions I attended.

13 4. Attached hereto as Exhibit 2 is a true and correct copy of a Letter dated March
14 21, 2007 from Attorney Phil Torres, counsel for Plaintiff-Intervenors, to Attorney Tim
15 Roberts, counsel for Leo Palace Resort. The letter had attached to it the medical
16 summary reports referenced within the letter but I have not attached them hereto, to
17 protect the privacy of Plaintiff-Intervenors.

18 5. On July 30, 2007, Counsel for Defendant took the depositions of Dr. Lilli
19 Perez-Iyechad and Dr. Tom Babauta, which depositions I attended.

20 6. EEOC has never received notice of Defendant's request for Independent
21 Medical Examination of Plaintiff-Intervenors specifying the time, place, manner,
22

1 conditions, and scope of the examination, and the person or persons by whom its to be
2 made.

3 I declare under penalty of perjury that the foregoing is true and correct. Executed
4 this 10th day of August, 2007, at Las Vegas, Nevada.
5

6
7 Angela D. Morrison

8 Angela D. Morrison
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28